

# **EXHIBIT 6**

---

**From:** Fitzmaurice, James <JFitzmaurice@willkie.com>  
**Sent:** Thursday, May 11, 2017 12:03 AM  
**To:** Solomon, Louis M. (Shld-NY-LT); McCallen, Benjamin; Savitt, Nancy (ProjectAtty-NY-LT)  
**Cc:** Baio, Joseph; Lazaroff, Michael S. (Shld-NY-LT); Reddy, Anne C. (Assoc-NY-LT)  
**Subject:** RE: BSGR v. Soros

Lou,

We cannot provide you with the name of a legal entity that might be named as a defendant in lieu of OSF because we do not believe there is any party or entity that engaged in the conduct as alleged in the complaint. This is not a situation where we can simply provide you with a name and reserve rights -- it goes to a fundamental dispute that we have about the failure of the complaint to allege wrongful conduct, and identify who did that conduct (a burden that rests with the plaintiff). While we understand that you have concerns about wanting to effect service, this is a situation where we as defense counsel cannot solve plaintiff's problem: you cannot serve something that doesn't exist. And we cannot identify a defendant for you to serve whom we do not believe engaged in the conduct that your client alleges "OSF" engaged in. It is unclear to us what plaintiff seeks to gain by naming some "OSF" entity as a defendant, given that we are not contesting that Mr. Soros was properly served.

We therefore propose the following: the parties agree to an extension of time for "OSF" to move without waiving defenses, and "OSF" moves forward with a motion on the same schedule as Soros. Please let us know if you agree. If you do not agree, we will send a letter to the court later today requesting to put the motion to dismiss from the named defendant OSF on the same schedule as the Soros motion. We will indicate that Plaintiffs do not consent to the request. Thank you.

Jim

James Fitzmaurice  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: +1 212 728 8956 | Fax: +1 212 728 9956  
[jfitzmaurice@willkie.com](mailto:jfitzmaurice@willkie.com) | [vCard](#) | [www.willkie.com/bio](http://www.willkie.com/bio)

---

**From:** lsolomon@gtlaw.com [mailto:lsolomon@gtlaw.com]  
**Sent:** Wednesday, May 10, 2017 4:35 AM  
**To:** McCallen, Benjamin <BMcCallen@willkie.com>; savittn@gtlaw.com; Fitzmaurice, James <JFitzmaurice@willkie.com>  
**Cc:** Baio, Joseph <jbaio@willkie.com>; lazaroffm@gtlaw.com; reddya@gtlaw.com  
**Subject:** RE: BSGR v. Soros

Ben, I'm not able to open the draft. I see your email, and it's fine. You are authorized to sign my name on the Soros-only stip and get it filed. On OSF, we request that you advise us the correct name of the OSF entity, if you contend that we have not used the right name or sued the "right" entity. I appreciate that you believe that there is no "right" entity. You can fully reserve your right to claim that.

Thank you.

Louis M. Solomon  
Global Co-Head, International Litigation

Greenberg Traurig, LLP | MetLife Building | 200 Park Avenue | New York, NY | 10166

[Lsolomon@gtlaw.com](mailto:Lsolomon@gtlaw.com) | Direct Tel: [212.801.6500](tel:212.801.6500) | Direct Fax: [212.801.6400](tel:212.801.6400)

*Lou's International Practice Domain:*

E-book ([www.internationalpractice.org](http://www.internationalpractice.org)); Blog (<http://blog.internationalpractice.org>)

---

**From:** McCallen, Benjamin [<mailto:BMcCallen@willkie.com>]

**Sent:** Tuesday, May 09, 2017 11:23 PM

**To:** Solomon, Louis M. (Shld-NY-LT); Savitt, Nancy (ProjectAtty-NY-LT); Fitzmaurice, James

**Cc:** Baio, Joseph; Lazaroff, Michael S. (Shld-NY-LT); Reddy, Anne C. (Assoc-NY-LT)

**Subject:** RE: BSGR v. Soros

Lou,  
Attached is an updated draft stipulation replacing the proposed stipulation from yesterday. This stipulation waives defenses under 12b4 and 5 for Mr. Soros as you requested, and extends the time to answer or move. We will have to get back to you on Open Society Foundations as we are still looking into that issue, but we would like to move forward with the Soros stip in the meantime. Let us know if this works, and we will adjust the letter accordingly and file along with the stip tomorrow. Thank you

**Benjamin P. McCallen**

**Willkie Farr & Gallagher LLP**

787 Seventh Avenue | New York, NY 10019-6099

Direct: +1 212 728 8182 | Fax: +1 212 728 9182

[bmccallen@willkie.com](mailto:bmccallen@willkie.com) | [vCard](http://vCard) | [www.willkie.com bio](http://www.willkie.com/bio)

---

**From:** [Lsolomon@gtlaw.com](mailto:Lsolomon@gtlaw.com) [<mailto:Lsolomon@gtlaw.com>]

**Sent:** Tuesday, May 09, 2017 11:13 AM

**To:** McCallen, Benjamin <[BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)>; [savittn@gtlaw.com](mailto:savittn@gtlaw.com); Fitzmaurice, James <[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)>

**Cc:** Baio, Joseph <[jbaio@willkie.com](mailto:jbaio@willkie.com)>; [lazaroffm@gtlaw.com](mailto:lazaroffm@gtlaw.com); [redhya@gtlaw.com](mailto:redhya@gtlaw.com)

**Subject:** RE: BSGR v. Soros

Ben I just tried you. I'm at 917 292 2484. Or, email me what you feel the error is.

Louis M. Solomon

Global Co-Head, International Litigation

Greenberg Traurig, LLP | MetLife Building | 200 Park Avenue | New York, NY | 10166

[Lsolomon@gtlaw.com](mailto:Lsolomon@gtlaw.com) | Direct Tel: [212.801.6500](tel:212.801.6500) | Direct Fax: [212.801.6400](tel:212.801.6400)

*Lou's International Practice Domain:*

E-book ([www.internationalpractice.org](http://www.internationalpractice.org)); Blog (<http://blog.internationalpractice.org>)

---

**From:** McCallen, Benjamin [<mailto:BMcCallen@willkie.com>]

**Sent:** Monday, May 08, 2017 6:32 PM

**To:** Savitt, Nancy (ProjectAtty-NY-LT); Fitzmaurice, James

**Cc:** Solomon, Louis M. (Shld-NY-LT); Baio, Joseph; Lazaroff, Michael S. (Shld-NY-LT); Reddy, Anne C. (Assoc-NY-LT)

**Subject:** RE: BSGR v. Soros

Lou, there is an error in the stipulation. Let me know when you can talk. We need to do so before we file the letter and stipulation. thanks

**Benjamin P. McCallen**  
**Willkie Farr & Gallagher LLP**  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: +1 212 728 8182 | Fax: +1 212 728 9182  
[bmccallen@willkie.com](mailto:bmccallen@willkie.com) | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

-----Original Message-----

From: [savittn@gtlaw.com](mailto:savittn@gtlaw.com) [<mailto:savittn@gtlaw.com>]  
Sent: Monday, May 08, 2017 6:20 PM  
To: Fitzmaurice, James <[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)>  
Cc: [lsolomon@gtlaw.com](mailto:lsolomon@gtlaw.com); McCallen, Benjamin <[BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)>; Baio, Joseph <[jbaio@willkie.com](mailto:jbaio@willkie.com)>; [lazaroffm@gtlaw.com](mailto:lazaroffm@gtlaw.com); [redhya@gtlaw.com](mailto:redhya@gtlaw.com)  
Subject: Re: BSGR v. Soros

With our edits accepted, Lou has authorized you to sign his name to the stipulation.  
Please let me know if you need anything further.  
Thank you.  
Nancy Savitt

Sent from my iPhone

On May 8, 2017, at 4:24 PM, Fitzmaurice, James <[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)<<mailto:JFitzmaurice@willkie.com>>> wrote:

Given our current deadlines, we also plan to file the letter to Judge Keenan this afternoon, noting that the stipulation will follow in an email to the clerk.

James Fitzmaurice  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: +1 212 728 8956 | Fax: +1 212 728 9956 [jfitzmaurice@willkie.com](mailto:jfitzmaurice@willkie.com)<<mailto:jfitzmaurice@willkie.com>> |  
[vCard<https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.willkie.com\\_professionals\\_f\\_fitzmaurice-2Djames-3Fformat-3Dvcf&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\\_Ol9wg&r=CfnlJiM4U\\_esLWt38G4tY\\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=A7GLE\\_n8lbgBa9Fsf3EYSqYdQbpNT\\_oazqFogGQg7m4&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.willkie.com_professionals_f_fitzmaurice-2Djames-3Fformat-3Dvcf&d=DwMGaQ&c=2s2mvbfY0UoSKkl6_Ol9wg&r=CfnlJiM4U_esLWt38G4tY_ghoUPqkFXsRU8RKraNrf8&m=5h2pG_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=A7GLE_n8lbgBa9Fsf3EYSqYdQbpNT_oazqFogGQg7m4&e=>) |  
[www.willkie.com bio<https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.willkie.com\\_professionals\\_f\\_fitzmaurice-2Djames&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\\_Ol9wg&r=CfnlJiM4U\\_esLWt38G4tY\\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=zCwg\\_z9KbGEu-4fitnZVlcoXewwn5dn\\_EO6aJypNWYo&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.willkie.com_professionals_f_fitzmaurice-2Djames&d=DwMGaQ&c=2s2mvbfY0UoSKkl6_Ol9wg&r=CfnlJiM4U_esLWt38G4tY_ghoUPqkFXsRU8RKraNrf8&m=5h2pG_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=zCwg_z9KbGEu-4fitnZVlcoXewwn5dn_EO6aJypNWYo&e=>)

From: Fitzmaurice, James  
Sent: Monday, May 08, 2017 4:08 PM  
To: 'lsolomon@gtlaw.com' <<mailto:lsolomon@gtlaw.com>> <[lsolomon@gtlaw.com](mailto:lsolomon@gtlaw.com)<<mailto:lsolomon@gtlaw.com>>>  
Cc: McCallen, Benjamin <[BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)<<mailto:BMcCallen@willkie.com>>>; Baio, Joseph <[jbaio@willkie.com](mailto:jbaio@willkie.com)<<mailto:jbaio@willkie.com>>>; [lazaroffm@gtlaw.com](mailto:lazaroffm@gtlaw.com)<<mailto:lazaroffm@gtlaw.com>>; [savittn@gtlaw.com](mailto:savittn@gtlaw.com)<<mailto:savittn@gtlaw.com>>; [redhya@gtlaw.com](mailto:redhya@gtlaw.com)<<mailto:redhya@gtlaw.com>>  
Subject: RE: BSGR v. Soros

Lou,

Attached is a copy of the stipulation with Willkie's signature on behalf of the defendants. Please send us a countersigned PDF at your earliest convenience, which we will submit to the clerk.

Thanks,

Jim

James Fitzmaurice  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue | New York, NY 10019-6099  
Direct: +1 212 728 8956 | Fax: +1 212 728 9956 [jfitzmaurice@willkie.com](mailto:jfitzmaurice@willkie.com)<<mailto:jfitzmaurice@willkie.com>> |  
[vCard<https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.willkie.com\\_professionals\\_f\\_fitzmaurice-2Djames-3Fformat-3Dvcf&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\\_Ol9wg&r=CfnlJiM4U\\_esLWt38G4tY\\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=A7GLE\\_n8lbgBa9Fsf3EYSqYdQbpNT\\_oazqFogGQg7m4&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.willkie.com_professionals_f_fitzmaurice-2Djames-3Fformat-3Dvcf&d=DwMGaQ&c=2s2mvbfY0UoSKkl6_Ol9wg&r=CfnlJiM4U_esLWt38G4tY_ghoUPqkFXsRU8RKraNrf8&m=5h2pG_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=A7GLE_n8lbgBa9Fsf3EYSqYdQbpNT_oazqFogGQg7m4&e=>)



3Fformat-

3Dvcf&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\_Ol9wg&r=CfnlJiM4U\_esLWt38G4tY\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=A7GLE\_n8lbgBa9Fsf3EYSqYdQbpNT\_oazqFogGQg7m4&e=> | [www.willkie.com](http://www.willkie.com) bio<[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_www.willkie.com\\_professionals\\_f\\_fitzmaurice-2Djames&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\\_Ol9wg&r=CfnlJiM4U\\_esLWt38G4tY\\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=zCwg\\_z9KbGEu-4ftnZVlcoXewwn5dn\\_EO6aJypNWYo&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.willkie.com_professionals_f_fitzmaurice-2Djames&d=DwMGaQ&c=2s2mvbfY0UoSKkl6_Ol9wg&r=CfnlJiM4U_esLWt38G4tY_ghoUPqkFXsRU8RKraNrf8&m=5h2pG_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=zCwg_z9KbGEu-4ftnZVlcoXewwn5dn_EO6aJypNWYo&e=>)>

-----Original Message-----

From: [lsolomon@gtlaw.com](mailto:lsolomon@gtlaw.com)<<mailto:lsolomon@gtlaw.com>> [mailto:[lsolomon@gtlaw.com](mailto:lsolomon@gtlaw.com)]

Sent: Friday, May 05, 2017 5:42 PM

To: Fitzmaurice, James <[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)<<mailto:JFitzmaurice@willkie.com>>>

Cc: McCallen, Benjamin <[BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)<<mailto:BMcCallen@willkie.com>>>; Baio, Joseph <[ibaio@willkie.com](mailto:ibaio@willkie.com)<<mailto:ibaio@willkie.com>>>; [lazaroffm@gtlaw.com](mailto:lazaroffm@gtlaw.com)<<mailto:lazaroffm@gtlaw.com>>; [savittn@gtlaw.com](mailto:savittn@gtlaw.com)<<mailto:savittn@gtlaw.com>>; [reddiva@gtlaw.com](mailto:reddiva@gtlaw.com)<<mailto:reddiva@gtlaw.com>>

Subject: Re: BSGR v. Soros

Btw the letter when conformed to the stip is fine.

Louis M. Solomon

Global Co-Head, International Litigation Greenberg, LLP | 200 Park Avenue | New York, NY | 10166<x-apple-data-detectors://1/1>

[lsolomon@gtlaw.com](mailto:lsolomon@gtlaw.com)<<mailto:lsolomon@gtlaw.com>> [mailto:[lsolomon@gtlaw.com](mailto:lsolomon@gtlaw.com)]]> |

Direct Tel: 212.801.6500<<tel:212.801.6500>> | Direct Fax: 212.801.6400<<tel:212.801.6400>> Lou's International Practice Domain:

E-book ([www.internationalpractice.org](http://www.internationalpractice.org)<[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_www.internationalpractice.org\\_&d=CwMFAQ&c=HZc2iMNQt2jZf4ve7hXwXw&r=b2ZdAjoYZ5GLws6\\_6VFSQG57BXakctKdpJaJ94Ab9xw&m=x6mUQTvOdEukGu4GhvFaCNrEE1cKD-eGytd5BgnPBEk&s=GvCT0AxCSJxKdiP4KmJ3hpcdlz5AqdzQWqVJcaD0pQc&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.internationalpractice.org_&d=CwMFAQ&c=HZc2iMNQt2jZf4ve7hXwXw&r=b2ZdAjoYZ5GLws6_6VFSQG57BXakctKdpJaJ94Ab9xw&m=x6mUQTvOdEukGu4GhvFaCNrEE1cKD-eGytd5BgnPBEk&s=GvCT0AxCSJxKdiP4KmJ3hpcdlz5AqdzQWqVJcaD0pQc&e=>)>

3A\_www.internationalpractice.org\_&d=CwMFAQ&c=HZc2iMNQt2jZf4ve7hXwXw&r=b2ZdAjoYZ5GLws6\_6VFSQG57BXakctKdpJaJ94Ab9xw&m=x6mUQTvOdEukGu4GhvFaCNrEE1cKD-

eGytd5BgnPBEk&s=GvCT0AxCSJxKdiP4KmJ3hpcdlz5AqdzQWqVJcaD0pQc&e=>

3A\_www.internationalpractice.org\_253chttps-3A\_urldefense.proofpoint.com\_v2\_url-3Fu-3Dhttp-2D3A-5F-5Fwww.internationalpractice.org-5F-26d-3DCwMFAQ-26c-3DHZc2iMNQt2jZf4ve7hXwXw-26r-3Db2ZdAjoYZ5GLws6-5F6VFSQG57BXakctKdpJaJ94Ab9xw-26m-3Dx6mUQTvOdEukGu4GhvFaCNrEE1cKD-2DeGytd5BgnPBEk-26s-

3DGvCT0AxCSJxKdiP4KmJ3hpcdlz5AqdzQWqVJcaD0pQc-26e&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\_Ol9wg&r=CfnlJiM4U\_esLWt38G4tY\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=a17JmIZCFmEEEwSGUzDCJ7r3Bcx9f9-Bsb6WZtMHiOQ&e=>=>);

Blog ([www.blog.internationalpractice.org](http://www.blog.internationalpractice.org)<[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_www.blog.internationalpractice.org\\_253chttps-3A\\_urldefense.proofpoint.com\\_v2\\_url-3Fu-3Dhttp-2D3A-5F-5Fwww.blog.internationalpractice.org-5F-26d-3DCwMFAQ-26c-3DHZc2iMNQt2jZf4ve7hXwXw-26r-3Db2ZdAjoYZ5GLws6-5F6VFSQG57BXakctKdpJaJ94Ab9xw-26m-3Dx6mUQTvOdEukGu4GhvFaCNrEE1cKD-2DeGytd5BgnPBEk-26s-3DMH90k7-5FXQMEP8gnWFjXmTYPGia-5FmXfTpvNkx8RWC6hk-26e&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\\_Ol9wg&r=CfnlJiM4U\\_esLWt38G4tY\\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=x9gVdpniazR6E1MTBcZA4n5JC2UrwLvXa\\_2QFYW8MLk&e=>=>](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.blog.internationalpractice.org_&d=CwMFAQ&c=HZc2iMNQt2jZf4ve7hXwXw&r=b2ZdAjoYZ5GLws6_6VFSQG57BXakctKdpJaJ94Ab9xw&m=x6mUQTvOdEukGu4GhvFaCNrEE1cKD-eGytd5BgnPBEk&s=MH90k7_XQMEP8gnWFjXmTYPGia_mXfTpvNkx8RWC6hk&e=>)>

3A\_www.blog.internationalpractice.org\_&d=CwMFAQ&c=HZc2iMNQt2jZf4ve7hXwXw&r=b2ZdAjoYZ5GLws6\_6VFSQG57BXakctKdpJaJ94Ab9xw&m=x6mUQTvOdEukGu4GhvFaCNrEE1cKD-

eGytd5BgnPBEk&s=MH90k7\_XQMEP8gnWFjXmTYPGia\_mXfTpvNkx8RWC6hk&e=>

url?u=http-3A\_www.blog.internationalpractice.org\_253chttps-3A\_urldefense.proofpoint.com\_v2\_url-3Fu-3Dhttp-2D3A-5F-5Fwww.blog.internationalpractice.org-5F-26d-3DCwMFAQ-26c-3DHZc2iMNQt2jZf4ve7hXwXw-26r-3Db2ZdAjoYZ5GLws6-5F6VFSQG57BXakctKdpJaJ94Ab9xw-26m-3Dx6mUQTvOdEukGu4GhvFaCNrEE1cKD-

2DeGytd5BgnPBEk-26s-3DMH90k7-5FXQMEP8gnWFjXmTYPGia-5FmXfTpvNkx8RWC6hk-26e&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\_Ol9wg&r=CfnlJiM4U\_esLWt38G4tY\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=x9gVdpniazR6E1MTBcZA4n5JC2UrwLvXa\_2QFYW8MLk&e=>=>)

26e&d=DwMGaQ&c=2s2mvbfY0UoSKkl6\_Ol9wg&r=CfnlJiM4U\_esLWt38G4tY\_ghoUPqkFXsRU8RKraNrf8&m=5h2pG\_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=x9gVdpniazR6E1MTBcZA4n5JC2UrwLvXa\_2QFYW8MLk&e=>=>)

On May 4, 2017, at 9:12 PM, Fitzmaurice, James

<[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)<<mailto:JFitzmaurice@willkie.com>> [mailto:[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)]]>> wrote:

Lou,

Attached are drafts of the letter and stipulation that Ben referenced earlier. Once you have reviewed and conferred with your clients, please let us know if you approve. If possible, we would like to get these on file tomorrow.

Thanks,

Jim

James Fitzmaurice

Willkie Farr & Gallagher LLP

787 Seventh Avenue | New York, NY 10019-6099

Direct: +1 212 728 8956 | Fax: +1 212 728 9956

[jfitzmaurice@willkie.com](mailto:jfitzmaurice@willkie.com)<<mailto:jfitzmaurice@willkie.com><<mailto:jfitzmaurice@willkie.com>%3cm~~mailto:jfitzmaurice@willkie.com~~>> | vCard<[-----Original Message-----](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.willkie.com_professionals_f_fitzmaurice-2Djames&d=DwMFAw&c=2s2mvbfY0UoSKkl6_OI9wg&r=dxDzbzEik4JJ32pRONar8ebU3UR2Y9nBTyx0S-_hKpM&m=VqD92b_xx1rXfUqINq3dPHVL08tDmXfW44UwUQKtcHQ&s=3Mawh-L8MpDsdhmMBA9lnbSY7P2ZFw4Elz1fG9iNSw&e=></a></del>>>></p></div><div data-bbox=)

From:

[Isolomon@gtlaw.com](mailto:Isolomon@gtlaw.com)<<mailto:Isolomon@gtlaw.com><<mailto:Isolomon@gtlaw.com>%3cm~~mailto:Isolomon@gtlaw.com~~>> [<mailto:Isolomon@gtlaw.com>]

Sent: Thursday, May 04, 2017 6:05 PM

To: McCallen, Benjamin

<[BMcCallen@willkie.com](mailto:BMcCallen@willkie.com)<<mailto:BMcCallen@willkie.com><<mailto:BMcCallen@willkie.com>%3cm~~mailto:BMcCallen@willkie.com~~>>>

Cc: Baio, Joseph

<[jbaio@willkie.com](mailto:jbaio@willkie.com)<<mailto:jbaio@willkie.com><<mailto:jbaio@willkie.com>%3cm~~mailto:jbaio@willkie.com~~>>> ; Fitzmaurice, James

<[JFitzmaurice@willkie.com](mailto:JFitzmaurice@willkie.com)<<mailto:JFitzmaurice@willkie.com><<mailto:JFitzmaurice@willkie.com>%3cm~~mailto:JFitzmaurice@willkie.com~~>>>

Subject: Re: BSGR v. Soros

Likely fine. Let me see the letter and stip when convenient. FYI I'm out of town M-W of next week.

Louis M. Solomon

Global Co-Head, International Litigation Greenberg, LLP | 200 Park Avenue | New York, NY | 10166<x-apple-data-detectors://1/1>

[Lsolomon@gtlaw.com](mailto:Lsolomon@gtlaw.com)<<mailto:Lsolomon@gtlaw.com>><<mailto:Lsolomon@gtlaw.com><<mailto:Lsolomon@gtlaw.com>%3cm~~mailto:Lsolomon@gtlaw.com~~>> | Direct Tel: 212.801.6500<<tel:212.801.6500>> | Direct

Fax: 212.801.6400<<tel:212.801.6400>> Lou's International Practice Domain:

E-book ([www.internationalpractice.org](http://www.internationalpractice.org)<[https://urldefense.proofpoint.com/v2/url?u=http-](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.internationalpractice.org&d=DwIF-)

[><\[\\(\\[www.blog.internationalpractice.org\\]\\(http://www.blog.internationalpractice.org\\)<\\[5\\]\\(https://urldefense.proofpoint.com/v2/url?u=http-3A\\_www.blog.internationalpractice.org&d=DwIF-g&c=2s2mvbfY0UoSKkl6\\_OI9wg&r=NQIRGFuVOFNsPftJRTmvKIYGGs2\\_3JNk3uluSQIN7WA&m=j0-sYWdJ35eqEXIHUVgrwz8XFJdrA49DDiJEMGgull&s=tM87G5S0ASOFImeKsAwTzIiwWfR2D8uydkbaiJ\\_zzoA&e=>https://urldefense.proofpoint.com/v2/url?u=http-3A\\_www.blog.internationalpractice.org-253chhttps-3A\\_urldefense.proofpoint.com\\_v2\\_url-3Fu-3Dhttp-2D3A-5F-5Fwww.blog.internationalpractice.org-26d-3DDwIF-2Dg-26c-</a></p></div><div data-bbox=\\)\]\(https://urldefense.proofpoint.com/v2/url?u=http-3A\_www.internationalpractice.org\_&d=CwMFAQ&c=HZc2iMNQt2jZf4ve7hXwXw&r=b2ZdAjoYZ5GLws6\_6VFSQG57BXakctKdpJaJ94Ab9xw&m=x6mUQTvOdEukGu4GhvFaCNReE1cKD-eGytd5BgnPBEk&s=GvCT0AxCSJxKdiP4KmJ3hpcdlz5AqdzQWqVJcaD0pQc&e=>\); Blog</p></div><div data-bbox=\)](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.internationalpractice.org&d=DwIF-g&c=2s2mvbfY0UoSKkl6_OI9wg&r=NQIRGFuVOFNsPftJRTmvKIYGGs2_3JNk3uluSQIN7WA&m=j0-sYWdJ35eqEXIHUVgrwz8XFJdrA49DDiJEMGgull&s=mbwSYO5IsdvoW30AIzqlSne5rmZz9TleSydytgOFn1k&e=>https://urldefense.proofpoint.com/v2/url?u=http-3A_www.internationalpractice.org-253chhttps-3A_urldefense.proofpoint.com_v2_url-3Fu-3Dhttp-2D3A-5F-5Fwww.internationalpractice.org-26d-3DDwIF-2Dg-26c-3D2s2mvbfY0UoSKkl6-5FOI9wg-26r-3DNQIRGFuVOFNsPftJRTmvKIYGGs2-5F3JNk3uluSQIN7WA-26m-3Dj0-2DsYWdJ35eqEXIHUVgrwz8XFJdrA49DDiJEMGgull-26s-3DmbwSYO5IsdvoW30AIzqlSne5rmZz9TleSydytgOFn1k-26e&d=DwMGaQ&c=2s2mvbfY0UoSKkl6_OI9wg&r=CfnJjM4U_esLWt38G4tY_ghoUPqkFXsRU8RKraNrf8&m=5h2pG_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=lxwK95EKygalJpQ8fLYZ5PlsX9jz6LBjsgvBnFJO5og&e=>=</a></p></div><div data-bbox=)



<BMcCallen@willkie.com<mailto:BMcCallen@willkie.com<mailto:BMcCallen@willkie.com%3cmmailto:BMcCallen@willkie.com>>><mailto:BMcCallen@willkie.com>> wrote:

While you are considering those dates and discussing with your client, we will send you shortly a draft cover letter that we would send to Keenan pursuant to his rules, along with a stipulation.

vCard<

**Subject: RE: BSGR v. Soros**

6







[---

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.](http://sYWdJ35eqEXIHUVgrwz8XFjJdrA49DDiJEMGgull&s=wSiAEwEtm2iHtGLNuGEi1hwKhvS0z2PugbomxFCCOWg&e=http://urldefense.proofpoint.com/v2/url?u=http-3A_www.willkie.com-253chttps-3A_urldefense.proofpoint.com_v2_url-3Fu-3Dhttp-2D3A-5F-5Fwww.willkie.com-26d-3DDwIF-2Dg-26c-3D2s2mvbfY0UoSkkI6-5FOI9wg-26r-3DNQIRGFuVOFNsPftJRTmvKIYGGs2-5F3JNk3uluSQIN7WA-26m-3Dj0-2DsYWdJ35eqEXIHUVgrwz8XFjJdrA49DDiJEMGgull-26s-3DwSiAEwEtm2iHtGLNuGEi1hwKhvS0z2PugbomxFCCOWg-26e&d=DwMGaQ&c=2s2mvbfY0UoSkkI6_OI9wg&r=CfnIjM4U_esLWt38G4tY_ghoUPqkFXsRU8RKraNrf8&m=5h2pG_fmmtddV8FJlbfqn8lasMNSAo1NR7EGAmo1Hn8&s=7rYyDRI9WXGm7rnnFYXKAqvFEpvre_2-ePd2kzOi5Pk&e=>=> > bio<https://urldefense.proofpoint.com/v2/url?u=http-3A_www.willkie.com_professionals_M_McCallen-2DBenjamin-2DP&d=DwMGaQ&c=2s2mvbfY0UoSkkI6_OI9wg&r=dxDzbzEik4JJ32pRONar8ebU3UR2Y9nBTyx0S-hKpM&m=YPH0vjHof1I-kY9f7kGUzLyR611_-aM2wj_BxnDZNqA&s=5jmixFFtkKlujaKvIX9VLjK58rY91zVAa0j-Q6yq3u8&e=></a></p></div><div data-bbox=)

---

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com)<<mailto:postmaster@gtlaw.com>><<mailto:postmaster@gtlaw.com><<mailto:postmaster@gtlaw.com>%3cmailto:postmaster@gtlaw.com%3e%3cmailto:postmaster@gtlaw.com>>>, and do not use or disseminate such information.

---

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.

---

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.

---

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners. <Draft Stipulation to Extend Time to Respond.docx> <Draft Letter to Judge Keenan Re Extension.docx>

---

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.

**Important Notice:** This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.

---

**Important Notice:** This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.

---

**Important Notice:** This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.